



Via ECF

Hon. Hugh B. Scott  
United States Magistrate Judge  
United States District Court  
2 Niagara Square  
Buffalo, NY 14202

RE: Privacy International, et al., v. Federal Bureau of Investigation, et al.  
No. 18-cv-1488 (W.D.N.Y.)

Dear Judge Scott,

This office represents the plaintiffs in the above-referenced action. On April 16, 2019, the Court granted a consent motion to extend by 30 days, through May, 17, 2019, the time to file the parties' joint proposed discovery plan. Plaintiffs, with the consent of defendants, hereby respectfully ask the Court to grant a further 30-day extension of the time to file their joint discovery plan, through June 17, 2019.

This matter concerns Freedom of Information Act requests that the plaintiffs have made to the 11 federal agency defendants. The parties continue to be engaged in discussions regarding the the scope of those requests and the accompanying searches for responsive records, but have not yet reached an agreement. As counsel for the defendants stated in his April 16, 2019, letter to the court, the scope of the FOIA requests will determine the length of time needed for defendants to search for and produce records, to file of a *Vaughn* index describing any records withheld or redacted, and subsequently for the parties to file dispositive motions, if necessary.

The parties hope to reach agreement on the scope of the FOIA request as soon as practicable. However, because discussions remain ongoing, we are not in a position to provide the proposed joint scheduling order required by the Court.

For these reasons, the plaintiffs, with consent of counsel for the defendants, respectfully request a further 30-day extension of the deadline to submit a joint proposed discovery plan to the Court, through June 17, 2019.

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Respectfully submitted,

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cc: All counsel of record (via ECF)